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and People Media, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT IS RELATED TO:

*In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

State of Utah et al. v. Google LLC et al., Case
No. 3:21-cv-05227-JD

*Match Group, LLC, et al., v. Google LLC, et
al.*, Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF DOUGLAS J. DIXON
IN SUPPORT OF THE MATCH
PLAINTIFFS' ADMINISTRATIVE MOTION
TO FILE UNDER SEAL**

Judge: Hon. James Donato

DECLARATION OF DOUGLAS J. DIXON

I, Douglas J. Dixon, declare:

1. I am a partner with the law firm of Hueston Hennigan LLP (“Hueston Hennigan”), counsel of record for Plaintiffs Match Group, LLC; Humor Rainbow, Inc.; PlentyofFish Media ULC; and People Media, Inc. (the “Match Plaintiffs”) in this action. I am an attorney duly licensed to practice law in the State of California and before this Court. I have personal knowledge of the facts set forth in this Declaration except as stated otherwise and, if called as a witness, could and would testify competently to such facts under oath.

2. I submit this Declaration in support of the Match Plaintiffs’ Motion to File Under Seal, filed herewith.

3. Hueston Hennigan specially negotiated per-hour billing rates for this matter with its clients the Match Plaintiffs, as described in Paragraph 8 to my Declaration in Support of Joint Statement by Consumer Plaintiffs, States and Match Plaintiffs of Attorneys’ Fees and Costs Awarded Pursuant to Chat Sanction Order.

4. Neither Hueston Hennigan nor the Match Plaintiffs have released these specially negotiated rates publicly. I am not aware of any public disclosure of these specially negotiated rates.

5. Disclosure of these rates would harm Hueston Hennigan by providing Hueston Hennigan’s competitors and current and prospective clients with nonpublic information about Hueston Hennigan’s specially negotiated fee arrangements for its clients the Match Plaintiffs.

6. I redacted only the portions of the following documents that, if disclosed, could identify or be used to identify Hueston Hennigan’s rates discussed above: (1) portions of the Declaration of Douglas J. Dixon in Support of Joint Statement by Consumer Plaintiffs, States and Match Plaintiffs of Attorneys’ Fees and Costs Awarded Pursuant to Chat Sanction Order; and (2) portions of Exhibit 1 to that declaration. These redactions are below:

Document	Corresponding Phrases
Declaration of Douglas J. Dixon in Support of Joint Statement by Consumer Plaintiffs, States and Match Plaintiffs of Attorneys’ Fees and	¶ 8: (in total)

Costs Awarded Pursuant to Chat Sanction Order	¶ 9: The clause between “The rates billed to the Match Plaintiffs are especially reasonable” and “and considering the complexity of this MDL.”
Exhibit 1 to Dixon Decl.	“Hours” Column: (in total) 2022 Rate Column: (in total, including partial heading) 2022-2023 Rate Column: (in total, including partial heading)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 21st day of April 2023, at Portland, Oregon.

/s/ Douglas J. Dixon

DOUGLAS J. DIXON